



European Organic Certifiers Council

cooperating for reliability!

to the attention of
DG AGRI of European Commission
Organic Unit

Brussels, March 25, 2020

Object: Covid-19 and organic controls

Dear EC Representatives,

First of all, the European Organic Certifiers Council (EOCC) hopes that the whole Organic Unit staff members as well as organic actors will keep safe and healthy in this difficult period of Covid-19.

Hereby, EOCC, representing 58 Control Bodies and Control Authorities in 32 countries, would like to draw your attention on the impact of Covid-19 on organic controls. The epidemic is growing, affecting more and more countries, implying lock-down measures and its length remains unknown. EOCC would like to share the temporary measures considered by its members to ensure the continuity of certifications and to address the situation on:

Difficulties to perform physical inspections:

According to the current regulation, Control Bodies and Control Authorities have to perform a physical inspection of each organic operator once a year.

In these trouble times, each Control Body/Control Authority has to find the right balance between maintaining the inspections (to guarantee the organic integrity) and avoiding any health risk for its staff members and for operators. Each CB/CA is forced to adapt its procedures.

For your information, EOCC Members are now exchanging, through a dedicated EOCC digital platform, on measures to be taken at their level, sharing measures taken by their national Competent Authorities and by their national Accreditation Bodies. From these exchanges, we can already notice a lot of discrepancy among European Member States policies, and among Third Countries.

Therefore, the EOCC proposal on this issue would be:

- To carry out physical inspections wherever and whenever it is possible
 - If these are not possible, in countries with high moving restrictions:
 - o For low risk operators currently in the control system and exceptionally this year, CBs/CAs would perform annual inspection through documentary controls where it is technically possible regarding the difficulties described in the chapter "Difficulties to edit and to post hard copies of Certificate of Inspection (COI)".
- These documentary controls would be in line and spirit with the provisions of art. 38, 3. 2) of REG 2018/848 to be applied from 01.01.2021. So basically, an

- anticipation and a pre-implementation of requirements already discussed and agreed during the revision process.
- For applicant or most risky operators, a remote audit is performed where it is technically possible regarding the difficulties described in the chapter “Difficulties to edit and to post hard copies of Certificate of Inspection (COI)”, for example on the basis of documentary check, on traceability check, on cross-check, also using other IT tools (like online video checks). An additional physical audit will be carried out afterwards, if the sanitary situation allows.
 - CBs/CAs may extend validity of certificates to operators that are directly impacted by the epidemic, or when necessary on a case by case approach.

Difficulties to edit and to post hard copies of Certificate of Inspection (COI)

In normal times, the Certificate of Inspection (COI), issued and validated digitally through TRACES, has to be printed, signed, stamped and posted to accompany the imported organic products.

In these times of Covid-19 and home-working, editing/printing/scanning the COI from home is not easy and time-consuming: IT equipment not adapted (if any), remote desktop connection and internet connection saturated and slow due to network overload, stamp not available from home,...

Once having printed and signed COIs, involved staff members of CBs/CAs face currently to a growing uncertainty about on-time delivery of original COIs. Postal companies, whether national or private (DHL or FedEx as frequent service providers for COI delivery) are confronted internally to withdrawal right of their own staff members, which considerably slows down the delivery of letters. In State of Emergency countries, such companies do not work any longer. For instance, in several Latin America countries, DHL has decided to stop providing such delivery services for an unknown period.

Sending the Hard copy of original COIs afterwards will create confusion, as a lot of them will arrive well after the clearance of the products. There is a strong risk that custom services will be overflowed with needless paperwork.

Not only CBs/CAs are impacted. National Custom services in Europe and first consignees located in Europe have to deal with the same problems (Difficulties to print or scan the hard copy of validated COI in boxes 20, 21 and to provide it to custom agent for clearance).

As a consequence, EOCC would welcome urgently tolerance and flexibility from the Commission, from the Competent Authorities and from the Custom Services in order for the imported products to be cleared on the single basis of the digital COI, available on Traces.

Difficulties to perform additional control measures of Guidelines UA, RU, KZ, MD and Guidelines China

In countries, for which Guidelines for additional control measures are edited, these control measures are also difficult to be performed.



This is, for example, the case of controls to be conducted during the seed period, samples to be taken before leaving the country (as CBs inspectors cannot go on-site).

Moreover, at this stage, it is still uncertain how laboratories will work in EU (as most of analyses are done in EU Laboratories) and how postal/carrier services will be able to deliver samples.

Last but not least, boarder closing, as this is already the case for some countries, prevents CBs active in such countries (without any office on site) to carry out their physical controls.

Therefore, EOCC proposal on this issue would be to exceptionally suspend the implementation of the additional control measures of Guidelines for the time of Coronavirus where it is not feasible.

EOCC is aware that the Organic Unit, as well as the DG AGRI, has to coordinate, from now on, its action together with other DGs and legal services of the European Commission.

Still, EOCC calls for the consideration on the above-described proposal for the quick reaction mechanism required by the Organic Certification Bodies and Certification Authorities to ensure adequate surveillance process and to maintain certification of organic operators.

Best Regards,

Georg Eckert
EOCC President